Case: 1:17-cr-00220 Document #: 69 Filed: 12/14/17 Page 1 of 3 PageID #:238

DEC 1 4 2017 PO

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

THOMAS G. BRUTON CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA)	Case No. 17 CR 220	
)		
v.)	Violations: Title 18, United States	
)	Code, Sections 2261A(2)(A) and	
IESHA STANCIEL and)	922(g)(1)	
CAMERON BATTISTE)		
)	SUPERSEDING INDICTMENT	
		HIME KENNELL	

COUNT ONE

MAGISTRATE JUDGE FINNEGAN

The SPECIAL FEBRUARY 2017 GRAND JURY charges:

On or about November 8, 2016, and continuing through on or about April 4, 2017, in the Northern District of Illinois, Eastern Division,

IESHA STANCIEL,

defendant herein, with intent to kill, injure, harass, and intimidate another person, namely, Individual A, did use an interactive computer service, electronic communication service, electronic communication system of interstate commerce, or any other facility of interstate commerce, namely, Facebook, to engage in a course of conduct that placed Individual A in reasonable fear of death and serious bodily injury;

In violation of Title 18, United States Code, Section 2261A(2)(A).

COUNT TWO

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about April 7, 2017, at Willowbrook, in the Northern District of Illinois, Eastern Division,

IESHA STANCIEL and CAMERON BATTISTE,

defendants herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, a Smith & Wesson, M&P-15 Sport II CA assault rifle bearing serial number TE38718, and a Smith & Wesson, Model SDV9E 9 mm pistol bearing serial number FYJ7552, which firearm had traveled in interstate commerce prior to their possession of it,

In violation of Title 18, United States Code, Section 922(g)(1).

Case: 1:17-cr-00220 Document #: 69 Filed: 12/14/17 Page 3 of 3 PageID #:240

FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Upon conviction of an offense in violation of Title 18, United States Code,

Section 922(g), as set forth in this Indictment, defendants shall forfeit to the United

States of America any firearm and ammunition involved in and used in the offense,

as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United

States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to: a Smith &

Wesson, M&P-15 Sport II CA assault rifle, bearing serial number TE38718; a Smith

& Wesson, Model SDV9E 9 mm pistol bearing serial number FYJ7552; and associated

ammunition.

	nn r	***	-	-
Α΄	ľKI	TH:	RII	

FOREPERSON

UNITED STATES ATTORNEY

3